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February 3, 2025

Hon. Judge Claire C. Cecchi, U.S.D.J.
United States District Court, District of New Jersey
2 Federal Square, Courtroom 5B
Newark, NJ 07102

Via: ECF

Re: Al Ummah Community Center et al. v. Teaneck et al.,
Civ. No.: 2:20-cv-14181-CCC-SDA

Dear Judge Cecchi,

I hope this correspondence finds you well. I represent the Plaintiffs and write to request that the Court vacate the 60-day Order and convene a conference to discuss the Plaintiffs filing a motion to enforce the settlement, for sanctions, and attorneys fees and costs.

By way of background, this case is about prolonged and insidious discrimination perpetrated against the Plaintiffs by the Defendants. While the Plaintiffs were presenting their case before the Teaneck Zoning Board of Adjustment (“BOA”), a Zoning Board member told to his colleagues that they, the Muslim founders and supporters of the AUCC, needed parking for their camels. Further, when the Plaintiffs were discussing their daycare facility, a Board Member asked his colleagues if they would really “trust these people with their kids?” The Plaintiffs were mistreated throughout the process and their application was denied.

The Plaintiffs filed this action in 2020 and spent years aggressively litigating this matter. That included tens of thousands of documents and numerous depositions. The parties spent months last Fall carefully crafting a proposed settlement agreement that in November 2024 resulted in a Settlement Agreement (“Agreement”). The BOA was required to present the Agreement to its members for review and approval in November. They failed to do so. They then considered the Agreement during the December 5, 2024 meeting and voted to approve the Agreement. Plaintiff signed the Agreement two days later on December 7, 2024. The BOA, however, has not produced a signed Agreement. The undersigned has spent the last two months

following up to obtain a signed Agreement to no avail. The BOA has proffered one unavailing excuse after another, including, incredulously, that there is no one to actually sign the Agreement.

The BOA's conduct continues its illegal actions and has caused a substantial delay in applying the Settlement, including preventing the Plaintiffs' from obtaining approval to open and operate. It further extends what has now been a series of purposeful delays that inhibited Plaintiffs from operating their Islamic Community Center for more than six years and counting. The BOA's actions have caused Plaintiffs substantial damages, and to incur substantial attorneys fees in following up for months to obtain a signed Agreement. In light of the foregoing, the Plaintiffs respectfully request that the Court vacate the 60-Day Order, and permit Plaintiffs to file a motion to enforce the Settlement, obtain a signed Agreement, along with a motion for fees and sanctions.

We thank the Court for its attention to this matter.

Respectfully submitted,
s/Aymen A. Aboushi
Aymen A. Aboushi, Esq.

Cc: All counsel of record via ECF